

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

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October 20, 2004

T.R.A. DOCKET ROOM

IN RE: *Petition of BellSouth*) Docket No. 03-00391
Telecommunications, Inc. for Exemption of)
Certain Services)

AT&T'S SUPPLEMENTAL RESPONSES TO DISCOVERY

Pursuant to the October 13, 2004, Order of the Hearing Officer, AT&T of the South Central States, LLC submits the following supplemental Responses to Interrogatories 1(c), 2, 3, 4, and 5 propounded by BellSouth Telecommunications, Inc.

BellSouth Interrogatory No. 1:

Please identify each fact witness you intend to present in this docket and, for each, please state:

- (c) all facts of which the witness is aware that support the witness' testimony.

Answer:

All facts of which the witness is aware that support his testimony are set forth in the direct testimony of Mark Argenbright, filed October 13, 2004.

BellSouth Interrogatory No. 2:

Please identify each expert witness you intend to present in this docket and, for each, please state:

- (a) the subject or subjects upon which the expert will testify;
- (b) the basis for your assertion that the witness is qualified as an expert including, but not limited to, a current curriculum vitae;
- (c) all tests, studies, measurements, experiments, or other analysis or actions performed or observed by the expert relating to the expert's testimony;

- (d) all opinions that the expert will present in this docket and the basis for each opinion; and
- (e) all facts of which you or the expert are aware that support those opinions.

Answer:

- (a) Mark Argenbright will testify regarding whether BellSouth's request to deregulate PRI service should be granted, as described at pp. 2-3 of his direct testimony.
- (b) Mr. Argenbright's curriculum vitae and his qualifications to testify as an expert are set forth in his direct testimony at p. 2.
- (c) Mr. Argenbright has done no tests, studies, measurements, experiments, or other analyses relating to his testimony other than the analyses described in his direct testimony.
- (d) All the opinions Mr. Argenbright will present in this docket and the basis for those opinions are set forth in his direct testimony.
- (e) All facts which Mr. Argenbright or AT&T intends to present in support of his opinions are reflected in his direct testimony.

BellSouth Interrogatory No. 3:

Please state whether you will contend in this docket that PRI service is not sufficiently competitive in Tennessee to qualify for exemption under T.C.A. § 65-5-208(b), and if you will contend such, state all bases upon which you will make such contention, and all facts which you believe support such contention.

Answer:

AT&T will content that PRI service is not sufficiently competitive in Tennessee to qualify for exemption from regulation. AT&T's basis for this contention is described in Mr. Argenbright's direct testimony.

BellSouth Interrogatory No. 4:

Please state whether you agree that competition for PRI services in Tennessee is an effective regulator of price for PRI service, and if you do not agree, please state why you do not agree and all facts that you believe support your position.

Answer:

AT&T does not agree that competition for PRI service is an effective regulation of the price for PRI service for the reasons set forth in Mr. Argenbright's direct testimony.

BellSouth Interrogatory No. 5:

Please identify all ways in which you believe exempting PRI service from tariff requirements would cause harm to any end-user in Tennessee and for each way identified, please explain:

- (a) the basis for your belief;
- (b) any example of such harm being caused anywhere else in the United States;
- (c) how likely you believe that harm would be to occur.

Answer:

(a) Exempting PRI service from the TRA's tariffing requirements will harm end users in Tennessee for the reasons set forth in Mr. Argenbright's direct testimony at pp. 6-11.


(b) AT&T has not prepared an analysis of how PRI service is regulated in other states and therefore has insufficient information to answer this question.

(c) The potential harm to end users is discussed in Mr. Argenbright's direct testimony at pp. 6-11. The likelihood of such harm depends upon whether the TRA grants BellSouth's request to deregulate PRI service and upon whether BellSouth uses its market power to engage in anti-competitive activities.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: _____


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CERTIFICATE OF SERVICE

I hereby certify that on October 20, 2004, a copy of the foregoing document was served on the following parties, via U.S. mail

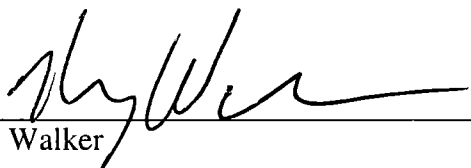
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